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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NAWSHEEN DUFFAYDAR,
Individually and on behalf all others
similarly situated,

Plaintiff,

V.

SONDER HOLDINGS INC., FRANCIS DAVIDSON, CHRIS BERRY, and DOMINIQUE BOURGAULT.

Defendants.

Case No. 2:24-cv-02952-SB (JCx)
[c/w: 2:24-cv-04798-MWF (JCx)]

**NOTICE OF RELATED CASES
[CIVIL L.R. 83-1.3.1]**

1 Pursuant to Local Rule 83-1.3.1, Defendants Sonder Holdings, Inc.
2 (“Sonder”), Francis Davidson, Chris Berry, and Dominique Bourgault (together,
3 “Defendants”) hereby give notice that this action (the “*Duffaydar Action*”) is related
4 to several other cases pending in this district.

5 First, this matter has been consolidated with another putative securities class
6 action, *Park v. Sonder Holdings Inc., et al.*, Case No. 2:24-cv-04798-MWF (JCx)
7 (C.D. Cal.) (the “*Park Action*”), which was filed on June 7, 2024 and consolidated
8 with this action on October 9, 2024 (together with this action, the “Securities Class
9 Action”). *See* Dkt. 40.

10 Second, this matter has previously been determined to be related to *Versen v.*
11 *Davidson, et al.*, Case No. 2:25-cv-00761-MEMF (JCx) (the “*Versen Action*”),
12 which was filed on January 28, 2025; *Akcayli v. Davidson, et al.*, Case No. 2:25-cv-
13 02060-AB (JCx) (the “*Akcayli Action*”), which was filed on March 7, 2025; and
14 *Hunter v. Aggarwal, et al.*, Case No. 2:25-cv-02352-ODW (JCx) (the “*Hunter*
15 Action”), which was filed on March 17, 2025 (collectively, the “Derivative
16 Actions”).

17 Prior to June 4, 2025, the Securities Class Action and Derivative Actions were
18 all pending before The Honorable Otis D. Wright, II. On June 4, 2025, Judge Wright
19 first recused himself from the *Duffaydar Action*, which has been re-assigned to Your
20 Honor. Next, Judge Wright recused himself from the *Park Action*, the *Versen*
21 Action, and the *Akcayli Action*, and each of these cases was reassigned to a different
22 judge.¹

23 Under this Court’s Local Rules, cases are related: “(a) [if they] arise from the
24 same or closely related transaction, happening, or event; (b) [if they] call for
25 determination of the same or substantially related or similar questions of law and
26 fact; or (c) for other reasons that would entail substantial duplication of labor if heard

27 ¹ The *Park Action* was reassigned to The Honorable Michael W. Fitzgerald. The *Versen Action*
28 was reassigned to The Honorable Maame Ewusi-Mensah Frimpong. The *Akcayli Action* was
reassigned to The Honorable Andre Birotte Jr.

1 by different judges.” L.R. 83-1.3.1. The Securities Class Action and the Derivative
2 Actions satisfy each of these criteria, as previously determined. *See* Dkt. 40; *Versen*
3 Action, Dkt. 21; *Akcayli* Action, Dkt. 10; *Hunter* Action, Dkt. 14.

4 The Derivative Actions are all shareholder derivative actions purportedly
5 brought on behalf of Sonder. The Securities Class Action and Derivative Actions
6 are based on the same underlying events – the same alleged misstatements in
7 Sonder’s SEC filings in fiscal years 2022 and 2023 relating to its accounting of lease
8 provisions – and assert nearly identical causes of action. All of the Defendants in
9 the Securities Class Action are also named in the Derivative Actions.

10 Accordingly, Defendants submit that the Securities Class Action and the
11 Derivative Actions continue to be related for the purposes of Local Rule 83-1.3.1,
12 and judicial economy would be served if each case was heard before this Court.
13

14 DATED: June 5, 2025

Respectfully submitted,

15 WILMER CUTLER PICKERING
16 HALE AND DORR LLP

17 By: /s/ Jessica Lewis

18 Jessica Lewis

19 Attorneys for Defendants

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